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January 24, 2022

Via PACER NDNY

Hon. Andrew T. Baxter
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

**Re: Robert Marshall Freeman v. Syracuse Time & Alarm Co., Inc.
Civil Action No. 5:21-cv-0874 (BKS/ATB)**

Dear Magistrate Baxter:

As you know, I represent the Defendant in the above-referenced matter. Please be advised that our office and Plaintiff's office will not be able to meet the current deadline to complete mandatory mediation by January 31, 2022 due to several scheduling conflicts. We are discussing possible dates in the month of February and are respectfully requesting an extension to complete mandatory mediation to February 28, 2022, on consent.

We appreciate your consideration in this matter. Thank you.

Very truly yours,

COHEN COMPAGNI BECKMAN APPLER & KNOLL, PLLC


Laura L. Spring

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cc: James Hartt, Esq. (*via PACER NDNY*)